NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-029

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: CONTACT INDUSTRIES, INC.

FILE NUMBER:

VHT FACILITY FILE NUMBER:

PERMIT #:

REGION: M

INSPECTION DATE: OCTOBER 9, 1991

INCIDENT/CASE NUMBER:

INSPECTION TYPE: RCRA - GEN/LDB

RESPONSIBLE AGENCY CODE: S

INSPECTOR'S NAME: STEPHAN SZARDENINGS

INSPECTOR'S AGENCY: DHWM

INSPECTOR'S BUREAU: METRO

EPA ID NUMBER: NJD002052017

ADDRESS: 641 DOWD AVE,
ELIZABETH, N.J. 07201

LOT: 101G BLOCK: 1

COUNTY: UNION

FACILITY PERSONNEL: MR. MATTHEW MORRIS - TECH. DIRECTOR
MR. ANDREW CATANZARO - PLANT MNGR.

TELEPHONE #: (908) 351-5900

OTHER STATE/EPA PERSONNEL:

REPORT PREPARED BY:

REVIEWED BY:

DATE OF REVIEW: 11/25/91

REVISION: 3
01/88

HWM-004C
1/90

Let's protect our earth

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
2 Babcock Place
West Orange, N.J. 07052
(201) 669-3960

NOTICE OF VIOLATION

ID NO. NJD002052017 DATE OCTOBER 9, 1991

NAME OF FACILITY CONTACT INDUSTRIES, INC.

LOCATION OF FACILITY 641 DOWD AVE, ELIZABETH, N.J. 07201

NAME OF OPERATOR MATTHEW MORRIS - TECHNICAL DIRECTOR

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION N.J.A.C. 7:26-9.3(a)3 = FAILURE TO HAVE A HAZARDOUS WASTE CONTAINER LABELED/MARKED WITH THE WORDS "HAZARDOUS WASTE" AND THE DATE UPON WHICH EACH PERIOD OF ACCUMILATION BEGINS. 9.3(d)4 - FAILURE TO MARK A CONTAINER WITH THE WORDS "HAZARDOUS WASTE". 9.4(d)4; - FAILURE TO HAVE ALL CONTAINERS SECURELY CLOSED, EXCEPT THOSE IN USE. 9.4(d)5 - FAILURE TO INSPECT CONTAINER STORAGE AREA ON A DAILY BASIS. 9.6(d)1 - FAILURE TO HAVE IMMEDIATE ACCESS TO COMMUNICATIONS/ ALARM SYSTEMS DURING HANDLING OF HAZARDOUS WASTE. 9.6(e) - FAILURE TO HAVE ADEQUATE AISLE SPACE BETWEEN CONTAINERS FOR UNOBSTRUCTIVE MOVEMENT OF EMERGENCY EQUIPMENT and PERSONEL.

Remedial action to correct these violations must be initiated immediately and be completed by NOVEMBER 8, 1991. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

NJDEP HAZARDOUS WASTE ADVISEMENT PROGRAM 1(609)292-8341

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection
STEPHAN SZARDENINGS

HWM-004C
1/90

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Division of Hazardous Waste Management
2 Babcock Place
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NOTICE OF VIOLATION

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DESCRIPTION OF VIOLATION N.J.A.C. 7:26-9.7(a) - FAILURE TO HAVE A WRITTEN CONTINGENCY PLAN. 9.6(f)4 - FAILURE TO NOTIFY LOCAL HOSPITAL(S) WITH PROPERTIES OF HAZARDOUS WASTE HANDLED ON-SITE. 9.6(f)3 - FAILURE TO HAVE AN AGREEMENT WITH AN EMERGENCY RESPONSE CONTRACTOR. 9.4(g)8 et seq. - FAILURE TO PERFORM SEMI-ANNUAL DRILLS. 9.4(g)5 - FAILURE TO ANNUALLY REVIEW INITIAL TRAINING RECIEVED BY FACILITY PERSONNEL. 9.4(g)6i-iii - FAILURE TO HAVE ADEQUATE PERSONNEL DOCUMENTS AND RECORDS.

Remedial action to correct these violations must be initiated immediately and be completed by NOVEMBER 8, 1991. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

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Investigator, Division of Hazardous Waste Management
Department of Environmental Protection
STEPHAN SZARDENINGS

TIME IN: _____

TIME OUT: _____

PHOTOS TAKEN (✓) YES (_) NO IF YES, HOW MANY? 8

SAMPLE TAKEN (_) YES (✓) NO NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (✓) YES (_) NO

Number of manifests in compliance 6

Number of manifests not in compliance 0

List manifest document numbers of those manifests not in compliance.

SITE BACKGROUND INFORMATION

EMPLOYEES: 50 # YEARS IN OPERATION: ~~15~~ 8 hr SHIFTS/WEEK: 1/5

ACRES: _____ # BUILDINGS: 2 PRODUCT PRODUCED /YR: Continuous

PREVIOUS OPERATIONS AT SITE: Originally NATIONAL SPRAY CAN FILLING. Building has always been used for manufacture of aerosols. 24 years.

WATER SUPPLY:
ELIZABETHTOWN WATER CO.

MONITORING WELLS:
NONE

SANITARY DISPOSAL:
JERSEY CARTING - E. Rutherford, N.J.

ENVIRONMENTAL PERMITS:
USEPA establishment # 10806NJ1 for pesticides.

CORPORATE INFORMATION: ———

PREVIOUS ENFORCEMENT HISTORY: NJDEPE - DEQ (Metro) for air monitering in June 91.

TANKS ON SITE: GRANDFATHERED ABOVE-GROUND TANK FARM - 23 [redacted] tanks

ADDITIONAL COMMENTS: Rewrite page

On 10/9/91, I conducted a RCRA inspection at Contact Industries, Inc. (CII) in Elizabeth, N.J. The facility representatives were Mr. Matthew Morris-Technical Director, and Mr. Andrew Cantanzaro-Plant Manager.

CII performs contract, customer specific, manufacturing of various hydrocarbon & carbon dioxide propelled aerosols. CII has approximately 100 different formulas from which products can be produced. The products that CII manufacture range from cleaners/polishes, lubricants, germicidal/insecticides, to pet products & paints. The products produced by CII are both water, and solvent based.

The majority of the raw materials used, are stored in bulk quantities. These chemicals are stored in a grandfathered, aboveground tank farm. The chemicals stored in these tanks are methylene chloride, acetone, methanol, 1,1,1-trichloroethane, xylene, toluene, perchloroethylene, mineral spirits, isobutane, propane, and SDA-40. CII will also store their smaller volume materials, and insecticides/germicidal agents in 55 gal. drums (inside their warehouse). CII gets their insecticides from the MGK Co. (see confidential section) in Minneapolis, MN., and has a USEPA establishment number (#10806NJ1), authorizing the use of insecticides in on-site generated products.

CII begins their operation by first retrieving the bulk solvents (if needed for their product) from the tankfarm, and directing them into the "compounding room". Here, CII pumps the material through a meter, and into an aboveground batching tank (the amounts added are scaled to a customers specific product

requirement). CII has four (4) batching tanks (1-2,000 gal., 1-1,000 gal., and 2-500 gal. capacity tanks), and one 350 gal. kettle. Next, the required additives (perfumes, colors, etc.) are added to the solvent solution, according to the customer specifications. Before being mixed in with the solvents, the drummed material (additives) is weighed to obtain the correct solution.

Next, the solution is mixed/blended together, and is pumped over to the product filler machines, when completed. The product goes into a small product hopper, that can apply regulated amounts of product into the specific can required to hold the product being manufactured. From here, the required valves are manually placed in the cans, and are sent towards the "gas room".

In the gas room, the cans have a propellant added, and the valves "crimped" in place to prevent leakage. Line #1 actually lifts up the valve slightly, applies the gas inside the can, and then crimps on the valve. Line #2 crimps the valve before having the gas applied inside the gas house, and later will insert a probe through the spray nozzle, to pressurize the aerosol can. The gas (propellant) used inside of the aerosol can is a hydrocarbon blend of isobutane & propane (2 forms- A70 & A46).

Once pressurized, the cans are run through a water bath to see that none of the cans are leaking their contents (DOT requirement). The cans are then air dried, and have a nozzle affixed if necessary. From here, the cans are packaged and shipped off to the customer.

The hazardous waste is generated from the cleaning operations

performed on the batching tanks, and the line purges/flushes that are performed in the piping running from the batch tanks, to the product filler machines. These cleaning operations are performed whenever a products color is being changed in the batching process, or an entirely different product is going to be mixed in the batch tank (Ex. changing from a silicate product to a pesticide based product). **It is important to note that only when solvent based mixtures are made, and subsequent washouts performed, is a potential hazardous waste produced**.

To perform the actual cleaning operations, CII will wash the batching tanks & kettle out with a solvent solution consistent with the last product mixed in that tank. This material is then placed inside a 55 gal. drum. Then, depending on the next product to be mixed, CII will wash the batching tanks & kettle out with alcohol. The alcohol is also then placed in the same 55 gal. drum used previously. This drum is then labeled with the product that was originally mixed in the batching tank.

CII then makes the determination as to it's reuse. CII will first try to rework this washout material back into a new batch being mixed, or will be supplemented with fresh solvent to be used to clean the batching tanks, or in a line purge/ flush operation. CII had several of these drums stored inside (@ 11-55 gal. drums), and considers this material an intermediate. If the washout drums can not be used as an intermediate material, they are then looked at as a material that can be run through their on-site still (a 35 gal. capacity DISTI still that can process @ 30 gal. of washout solvent/alcohol daily), to recover a clean

solvent material which then could be reused in their mixing operation. This material that is run through the still is not considered to be a solid waste (and hence, a hazardous waste) by the company (see NJAC 7:25-1.6(b)5). Having gone through the still, CII calls this material a "Washed Solution", and is ready to be reused in CII's operation. All other drums of waste material that cannot be run through the still to beneficially reclaim any solvent out of the washout solution, are sent to the back of the facility to be stored as a hazardous waste. **RE:** Since CII's still can only reclaim a limited amount of solvent daily, CII also stores these recyclable drums in the back of their facility.

In the back of CII's property, they have designated two areas to store their washout material. They have @ 127 - 55 gal. drums stored here. An accurate count was made difficult due to improper storage of the drums. Included in these 127 drums were washout materials that would be considered both hazardous and non-hazardous. However, CII could not distinguish which drums were, or weren't hazardous. This inspector could only assume that all of the drums contained a hazardous waste. It is the responsibility of CII to make sure they segregate their waste streams properly.

CII also originally claimed that all of the material stored in the back was not considered a hazardous waste, because they intended to rework as much of the material (through the still) as possible. CII stated that once they had enough material stored in the back, to fill a tanker trailer (@5,000 gal.), then they would

call their hazardous waste contractor (Safety-Kleen - Linden, N.J.) for a sampling episode, and hazardous waste pickup. I explained to CII the recycling exemptions, and the regulations that still pertained to them (NJAC 7:26-9.3(a)1; 9.3(a)3; 9.4(d)4 etseq.; 9.4(d)5; 9.4(d)6; 9.4 (e) etseq.; 9.6(e)). Especially noting that even though they might plan to rework a washout solution by placing it through the still, the washout solution must be considered a hazardous waste because it has to be reworked in order to obtain a usable product. However, the intermediates that CII uses, do not need to be considered a hazardous waste, because they can be reused without first being run through the still.

CII generally sends their hazardous waste offsite as an F005 waste stream. But, A) depending on the solvent based products they produce, B) the constituents that they are comprised of, C) and the results of the sampling episode that their hazardous waste contractor performs, determines what hazardous waste code the waste will be shipped offsite as. Note: In CII's Generator's Annual report for 1990, CII indicated that they generated an F001 waste stream in combination with the other waste streams. When performing the facility tour, I saw no signs of any type of degreasing operations.

The drums stored in the back of CII's building were all cited for several drum handling/management violations found while inspecting them (as per Mr. Andrew Catanzaro, all of the drums shown to this inspector contained both hazardous and non-hazardous waste). These drums (All 127 drums) were cited for

failure to have a hazardous waste container properly labeled/marked with the words "Hazardous Waste", and the date upon which each period of accumulation begins (9.3(a)3)- it is up CII to properly designate which of the drummed waste material is in fact hazardous; failure to have all containers securely closed, except those in use (9.4(d)4i)= 5-55 gal. drums (including 1 satellite accumulation drum) were in violation; failure to have adequate aisle space between containers for unobstructed movement of emergency equipment and personnel. CII also had several other drum related violations cited against them. They were for failing to inspect the container storage area on a daily basis (9.4(d)5); and failure to have immediate access to communications/alarm systems during handling of hazardous waste (9.6(d)1). **RE:** It should also be noted that CII has did not make a shipment of hazardous waste offsite since June 22, 1990.

Two satellite accumulation containers (55 gal. drums) were found in the batching tank room, and still room. These drums were found to contain a solvent based washout material. These drums were cited for failure to properly label a container with the words "Hazardous Waste" (9.3(d)4).

The facility tour resulted in NOV's being issued only for the drum violations listed above. The rest of the facility operations were found to be in satisfactory compliance with Department regulations.

Next, the required documentation review was performed. First the manifests were reviewed. All of CII's manifests were found to be properly completed, and in compliance. Upon performing the

required checklist inspection, CII was lacking in several areas of the required paperwork. CII was cited for failing to have a written contingency plan (9.7(a)); failure to notify local hospital(s) with the properties of hazardous waste handled onsite (9.6(f)4); failure to have an agreement with an emergency response contractor (9.6(f)3); failure to perform semi-annual drills (9.4(g)8 etseq.); failure to annually review initial training received by facility personnel (9.4(g)5); and failure to have adequate personnel documents and records (9.4(g)6i-iii).

Referral to the USEPA should be made because manifest NJA0741384 failed to have the proper land ban notifications accompanying it.

-B-

Describe the activities that result in the generation of hazardous waste.

SEE NARRATIVE

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

129 - 55gal drums of WASTE FLAMMABLE LIQUID, N.O.S. (F002 F003 F005)

* Includes 2 - 55gal. satelite accumulation drums.

All of these drums may possibly contain a hazardous waste, See narrative.

GENERAL CHECKLIST

		YES	NO	N/A
GENERAL				
7:26-7.4(a)1	Does the Generator have an EPA ID number?	✓		
HAZARDOUS WASTE DETERMINATION				
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	✓		
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	✓		
	Is the waste hazardous?	✓		
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	✓		
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).			
7:26-7.4(a)4i	The generator's name, address and phone number.	✓		
7:26-7.4(a)4ii	The generator's EPA ID number.	✓		
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓		
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓		

		YES	NO	N/A
7:26-7.4 (a)4vii	Did the generator describe all N.O.S. wastes in Section J?	✓		
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	✓		
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:			
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓		
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓		
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓		
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓		
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?			✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?			✓

7:26-9.3 Accumulation Time

How is waste accumulated on site?

(X) Containers
(__) Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
(__) Tanks (less than 90 days)
(__) Above ground
(__) Below ground
(__) Surface impoundments
(complete HWMF (TSD) Facility Checklist)
(__) Piles (complete HWMF checklist)

		YES	NO	N/A
7:26-9.3(a)1	Is waste accumulated for more than 90 days?	—	✓	—

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

Containers		YES	NO	N/A
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone).	—	—	—
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	✓	—	—
	If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)4i	Are all containers securely closed except those in use?	—	✓	—
7:26-9.4(d)4iii	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?	✓	—	—
7:26-9.4(d)4iv	Are containerized hazardous wastes segregated in storage by waste type?	✓	—	—
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible? NONE OF THE CONTAINERS LABELED.	—	—	✓
7:26-9.4(d)5	Is the container storage area inspected at least daily?	—	✓	—
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?	✓	—	—
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?	✓	—	—
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?	—	✓	—

		YES	NO	N/A
7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)	✓		
Tanks (Less than 90 day storage)				
7:26-9.3(b)	Does the generator accumulate hazardous waste on-site in an above ground tank?			✓
	If yes, describe the tank(s): 1) Capacity _____ 2) Shell thickness _____ 3) Material Construction _____ 4) Age of tank _____			
7:26-9.3(b)	Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?			
7:26-9.3(b)1	Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?			
7:26-9.3(b)4	Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?			
7:26-9.3(b)5	Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?			
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?			
7:26-9.3(b)8	If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is is secondary containment provided for the below grade part?			
7:26-10.5(c)1	Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?			
7:26-10.5(c)2	Does the generator use appropriate controls and practices to prevent overfilling?			

		YES	NO	N/A
7:26-10.5(c)2ii	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?			✓
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?			
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?			
7:26-10.5(d)1i	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?			
7.26-10.5(d)ii	Does the containment system consist of material compatible with the wastes being stored?			
7:26010.5(d)iii	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?			
7:26-10.5(d)iii	Is the tank protected from contact with accumulated liquids?			
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?			
7:26-10.5(d)2	Is run-on into the containment area prevented?			
	If not, explain.			
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?			
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?			↓

		YES	NO	N/A
7:26-10.5(d)4i	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?			✓
7:26-9.4(g)4	<u>Personnel Training</u> Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	✓		
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?		✓	
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	✓		
	Is there written documentation of the following:			
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?		✓	
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?		✓	
7:26-9.4(g)6iii	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?		✓	
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	✓		
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓		

		YES	NO	N/A
7:26-9.6	Preparedness and prevention			
	Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-96(b)1	An internal communications or alarm system?	✓		
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	✓		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?	✓		
7:26-9.6(c)	Is equipment tested and maintained?	✓		
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?		✓	
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?		✓	
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	✓		
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type waste handled on site:			
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.	✓		

RIGHT-TO-KNOW

		YES	NO	N/A
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	—	—	✓
7:26-9.6(f)3	ELIZABETH F.D. & P.D. only. Agreements with emergency response contractors, and equipment supplies?	—	✓	—
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	—	✓	—
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually? JULY of 1991 last inspection	✓	—	—
7:26-9.6(f)6	If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.	—	—	✓
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?	—	✓	—
7:26-9.4(g)81	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?	—	✓	—
7:26-9.4(g)811	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?	—	✓	—
	If yes, did the owner operator provide those specific local officials with written approval of the exemption?	—	—	—

		YES	NO	N/A
7:26-9.7	Contingency Plan and Emergency Procedures			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?		✓	
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? SMALL FIRE IN GAS ROOM IN JUNE, 1988		✓ *	
7:26-9.7(c)	Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?		* NO CONTINGENCY PLAN IN EFFECT.	
			✓	
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.			✓
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?			✓
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?		✓	

		YES	NO	N/A
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?		✓	
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?		✓	
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)?		✓	
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:			
	1. Maintained at the facility;		✓	
	2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?		✓	
7:26-9.7(k)	Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures?	✓		

DRAFT

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: CONTACT INDUSTRIES, INC.

U.S. EPA I.D. No.: NJD002052017

Street: 641 DOWD AVE.

City: ELIZABETH State: N.J. Zip 07201

Telephone: (908) 351-5900

Inspection Date: 10/9/91 Time: _____(am/pm)

Weather Conditions: _____

	Name	Agency/Title	Telephone
Inspectors:	STEPHAN SZARDENINGS	NJDEPE	(201) 669-3900
Facility Representatives:	MATTHEW MORRIS-TECH, DIRECTOR		(908) 351-5900
	ANDREW CATANZARO-PLANT MNGR		" " "

	Generate	Transport	Treat	Store	Dispose
F-Solvent	*				
Dioxin	—				
California List	—				
First Third [268.10]	—				
Second Third [268.11]	—				
Third Third [268.12]	—				

DRAFT

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

CII generally sends their hazardous waste offsite as an F005 waste stream. But, A) depending on the solvent based products they produce, B) the constituents that they are comprised of, C) and the results of the sampling episode that their hazardous waste contractor performs, determines what hazardous waste code the waste will be shipped offsite as. Note: In CII's Generator's Annual report for 1990, CII indicated that they generated an F001 waste stream in combination with the other waste streams. When performing the facility tour, I saw no signs of any type of degreasing operations.

Summary:

DRAFT

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

A. Does the facility handle the following wastes?

1. F001 through F005 spent solvents

   Yes ✓ No ___ List* F005, F002, F003

2. F020-F023 and F026-F028 dioxin-containing wastes

   Yes ___ No ✓ List* _____

3. California List Wastes
   (See Appendix A for potential California list applicability)

   Yes ___ No ✓ List* _____

4. First Third Wastes [268.10]

   Yes ___ No ✓ List* _____

5. Second Third Wastes [268.11]

   Yes ___ No ✓ List* _____

6. Third Third Wastes [268.12]**

   Yes ___ No ✓ List* _____

* List wastes if room allows or attach Appendix A.
** Note: Effective 09/25/90 large quantity generators and TSDs must use the Toxicity Characteristic Leaching Procedure (TCLP) instead of the Extraction Procedure (EP) for determining the Toxicity Characteristic. Small quantity generators must comply with this new requirement for 03/25/91.

B. Waste Code Determination

1. Has the facility correctly identified all wastes for purposes of compliance with Part 268? (Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.)

   Yes ✓ No ___

If no, list below:

Assigned Classification	Correct Classification

Comments: _____

2. Has the facility assigned both the listed and characteristic waste code, where a listed waste exhibits a characteristic? [268.9(a)]

Yes ___ No ✓ NA ___

C. Does the facility handle the following wastes (national capacity variances)?

1. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, K071 (expires - 08/08/90).

Yes ___ No ✓

Comments _____

2. Contaminated soil and debris which had treatment standards based on incineration set in the First Third Rule - K015, K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K083, K086, K087, K101, K102, K103, and K104 (expires - 08/08/90).

Yes ___ No ✓

Comments _____

3. All wastes with a treatment standard set in the Third Third rule (includes wastes which previously fell under the soft hammer provision (expires - 08/08/90).

Yes ___ No ✓

Comments _____

4. F001-F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (expires - 11/08/90). [268.30(c)]

Yes ___ No ✓

Comments _____

5. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [268.31(b)]

Yes ___ No ✓

Comments _____

6. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [268.32(d)(2)]

Yes ___ No ✓

Comments _____

7. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111/U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [268.34(d)]

Yes ___ No ✓

Comments _____

8. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, vitrification, or wet air oxidation - F039, K031, K071, K084, K101, K102, K106, P010, P011, P012, P015, P036, P038, P065, P073, P087, P092, P103, P114, U136, U151, U204, U205, D001(ignitable liquids mixed with sludges and solids), D004, D006 (cadmium batteries), D009 (expires - 05/08/92). [268.35(e)]

Yes ___ No ✓

Comments _____

9. The following non-wastewaters - F019, K031, K071, K084, K101, K102, K106, P010, P011, P012, P015, P036, P038, P065, P073, P087, P092, P103, P114, U136, U151, U204, U205, D004, D006 (cadmium batteries), D007(refractory brick), D008(slag and matte generated from secondary smelting process), D009, D010 (expires - 05/08/92). [268.35(b)]

Yes ___ No ✓

Comments _____

10. F039 multi-source leachate (non-wastewaters) derived from disposal of any listed waste, and any leachate that exhibits a characteristic of hazardous waste (effective date - 05/08/92). [268.35(c)]

Yes ___ No ✓

Comments _____

11. Mixed radioactive/hazardous wastes (expires - 05/08/92). [268.35(d)]

Yes ___ No ✓

Comments _____

DRAFT

GEN

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ✓ No ___ NA ___

   If yes, list the waste code(s) and check the treatability group for each.

Waste Code	Wastewater*	Non-wastewater
F002, F003, F005		✓

* Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents. [268.2(a)(6)(i)]

Comments _____

2. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

   Yes ___ No ___ NA ✓

   If yes, list each waste code and check the correct treatability group:

Waste Code*	Wastewater**	Non-wastewater

* Include subcategory

** Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 - less than 5% by weight TOC and less than 1% TSS; K025, K103, and K104 - less than 4% by weight TOC and less than 1% TSS. [268.2(a)(ii-iv)]

Comments _____

b. Does the assigned treatment standard for listed wastes cover constituents that may cause the waste to exhibit any characteristics?

Yes ✓ No ___ NA ___

c. Does the generator specify the alternate treatment standards for lab packs?

Yes ___ No ___ NA ✓

If yes, do lab packs contain the following wastes exclusively?

	Yes	No
Organics: Part 268, Appendix V constituents	___	___
Inorganics: Part 268, Appendix IV constituents	___	___

d. Does the generator specify alternate treatment standards for F039 multi-source leachate?

Yes ___ No ___ NA ✓

If yes, was the leachate derived from the treatment, storage, disposal, or recycling of more than one listed waste?

Yes ___ No ___

Comments _____

_____

3. California List Wastes: Has the generator correctly identified the treatability group and/or treatment standard/prohibition level for the following wastes?

a. Liquid hazardous wastes containing PCBs ≥50ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs

___ ≥500 ppm PCBs

b. Wastes identified as hazardous by a characteristic property that does not involve HOCs, containing ≥1,000mg/l (liquids) or mg/kg (non-liquids) HOCs

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

Comments _____

d. National Capacity Variance Wastes: Has the generator correctly identified California List prohibitions/treatment standards which are applicable to First, Second and Third Third wastes which have national capacity variances in effect? (see pages 4-6 for national capacity variances in effect and Appendix A for potential California List applicability)

Yes ___ No ___ NA ✓

If yes, list each waste code, California List waste applicability, and the expiration date of the national capacity variance.

Waste Code	Cal List Applicability	Expiration Date
		/ /
		/ /
		/ /

Comments _____

4. Treatment standards expressed as specified technologies: Has the generator specified an alternative method to that required in 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 268.42, the alternative method, and documentation of approval.

Waste Code	268.42 Technology	Alternative Method	Approval

Comments _____

5. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓

Comments _____

If yes, did the generator select the most stringent treatment standards? [268.41/.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether the restricted waste exceeds treatment standards/prohibition levels at the point of generation? [268.7(a)]

Yes ✓ No ___

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Does the generator make this determination using:

a. Knowledge of waste:

Yes ✓ No ___ NA ___

If yes, list the wastes for which "applied knowledge" was used and describe the basis of determination. Attach documentation.

F005, F003, F002 waste stream)

Was all supporting data retained on site? [268.7(a)(5)]

Yes ✓ No ___ NA ___

b. TCLP*: Are wastes with treatment standards specified in 268.41 analyzed using TCLP? (BDAT** = immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure [Part 261, Appendix II, EPA Test Method 1311)

**BDAT = best demonstrated available technology

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
F005, F003, F002 waste stream 7-19-90

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology)

Yes ✓ No ___ NA ___

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
F005, F003, F002 waste stream

d. pH ≤ 2:

Yes ___ No ✓ NA ___

If yes, list the wastes for which pH testing was used and provide the date of the last test, the frequency of testing, and note any problems. Attach test results.
F005 No D002 waste stream - TSD just tested material for pH.

e. PFLT*: Was PFLT used specifically to determine if California List wastes were contained in liquid hazardous waste?

Yes ✓ No ___ NA ___

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
F005, F003, F002 waste streams.

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 262.34?

Yes ___ No ✓ (If no, go to 4)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted?

Yes ___ No ___ (If no, go to 4)

Does the plan provide the following?

	Yes	No
Detailed chemical and physical analysis of the restricted waste as justification for frequency of testing	___	___
Necessary information to treat the wastes in accordance with Part 268 requirements	___	___
Discussion of number of wastes treated, their variability, and variability of the treatment process	___	___

Comments _____

Has the plan been filed with the Regional Administrator? (return receipt, Federal Express slip, etc. for verification)

Yes ___ No ___ NA ___

4. Dilution Prohibition [268.3]:

a. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓

If yes, list the wastes _____

Are the wastes susceptible to co-treatment?

Yes ___ No ___ NA ✓

Comments _____

b. Does the generator dilute restricted wastes as a substitute for adequate treatment?

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 268.41 and 268.43?

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ✓

Comments _____

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

If yes, the TSD Checklist must be completed.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds the treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes ✓ No ___ (If no, go to 3)

If yes, identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Subsequent Handler
F005	SAFETY-KLEEN in Linden, N.J.

b. Does the generator provide notifications to the treatment or storage facility? [268.7(a)(1)]

Yes ✓ No ___ (If no, go to 3)

If yes, does the notification contain the following?

EPA Hazardous waste number(s) (including all wastes contained in a lab pack)	Yes ✓	No ___	
Lab pack certification [268.7(a)(8)(i)]*	Yes ___	No ___	NA ✓
Applicable treatment standards/ prohibitions levels for F-solvents, F039 multi-source leachate, and California list wastes	Yes ✓	No ___	NA ___
Referenced treatment standards for all other wastes	Yes ✓	No ___	NA ___
Manifest number	Yes ✓	No ___	

GEN

Waste analysis data, if available Yes ✓ No ___

* Required only if alternative treatment standards are specified

c. Is a notification sent with each waste shipment?

Yes ✓ No ___ (If yes, go to 3)

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___

If yes, list waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets the treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If no, go to 4)

If yes, identify waste code(s) and off-site disposal facilities:

Waste Code	Facility
___	___
___	___
___	___

b. Does the generator provide notification and certification to the disposal facility? [268.7(a)(2)]

Yes ___ No ___ (If no, go to 4)

If yes, does notification contain the following?

EPA Hazardous waste number(s) (including all wastes contained in a lab pack) Yes ___ No ___

GEN

Lab pack certification [268.7(a)(8)(i)]*	Yes ___	No ___	NA ___
Applicable treatment standards/ prohibitions levels for F-solvents, F039 multi-source leachate, and California list wastes	Yes ___	No ___	NA ___
Referenced treatment standards for all other wastes	Yes ___	No ___	NA ___
Manifest number	Yes ___	No ___	
Waste analysis data, if available	Yes ___	No ___	
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ___	No ___	

* Required only if alternative treatment standards are specified

c. Is notification and certification sent with each waste shipment?

Yes ___ No ___ (If yes, go to 4)

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___

If yes, list waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and certification to the receiving facility with the first waste shipment subject to the tolling agreement? [268.7(a)(9)]

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a TSD which are subject to a national capacity variance*, case-by-case extension (268.5), or no migration petition (268.6)? (see pages 4-6 for national capacity variances)

Yes ___ No ✓ (If no, go to 5)

*Note that the requirements of this section apply to all wastes granted an extension in the Third Third rule from 05/08/90 to 08/08/90. Some of these wastes previously fell under the soft hammer provision.

If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [268.7(a)(3)]

Yes ___ No ___ (If no, go to 5)

If yes, does the notification contain the following information?

EPA Hazardous waste number(s)	Yes ___	No ___	
Applicable treatment standards for F039 multi-source leachate	Yes ___	No ___	NA ___
Referenced treatment standards for all other wastes	Yes ___	No ___	NA ___
Manifest number	Yes ___	No ___	
Waste analysis data, if available	Yes ___	No ___	
Date the waste is subject to the prohibitions	Yes ___	No ___	

b. Is a notification sent with each waste shipment?

Yes ___ No ___ (If yes, go to 5)

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___

If yes, list waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [268.7(a)(9)]

Yes ___ No ___

5. Records Retention

a. Does the generator retain on site copies of all notifications, certifications, and soft hammer demonstrations/certifications for a period of 5 years? [268.7(a)(6)]

Yes ___ No ✓

Comments One manifest (NJA0741384) failed/was found to be lacking a land disposal notification form with site.

b. Do these documents reflect proper management of wastes previously covered under expired national capacity variances and the soft hammer provision*? (See Appendix C)

Yes ✓ No ___ NA ___

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

D. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ✓ No ___

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F005	DISTILLATION	35 gal. capacity STILL.*

* IN OPERATION SINCE 1988.

2. Are treatment residuals generated from these units?

Yes ✓ No ___ NA ___

Comments Possible still bottoms could be produced. None have yet to be generated.

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ___ NA ✓

Comments ___

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
carbon tetrachloride	___Yes	___No
chlorinated fluorocarbons	___Yes	___No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
chlorobenzene	___Yes	___No
trichlorofluoromethane	___Yes	___No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	___No
ortho-dichlorobenzene	___Yes	___No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	___Yes	___No
acetone	___Yes	___No
ethyl acetate	___Yes	___No
ethyl benzene	___Yes	___No
ethyl ether	___Yes	___No
methyl isobutyl ketone	___Yes	___No
n-butyl alcohol	___Yes	___No
cyclohexanone	___Yes	___No
methanol	___Yes	___No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

___Yes ___No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	✓No
nitrobenzene	___Yes	✓No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	✓Yes	___No
methyl ethyl ketone	✓Yes	___No
carbon disulfide	___Yes	✓No
isobutanol	✓Yes	___No
pyridine	___Yes	✓No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?

___Yes ✓No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?

✓Yes ___No

If yes, list the constituents.

→ All are possible, it depends on which products are currently being produced at the time.

(c) Are the constituents used as diluents?

___Yes ✓No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?

___Yes ✓No

N-001 (REV. 9/86)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

JAN 22 1990

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Contact Industries, 641 Dowd Avenue, Elizabeth, N.J. 07201

4. Generator's Phone (201) 351-5200

A. State Manifest Document Number: **NJA 0741384**

B. State Generator's ID: Same

5. Transporter 1 Company Name: Continental Carrier Inc.

6. US EPA ID Number: [illegible]

C. State Trans. ID: NJDEP S 5771

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (201) 727-1188

E. State Trans. ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address: Safety Kleen Corp., 1200 Sylvan Street, Linden, N.J. 07036

10. US EPA ID Number: [illegible]

G. State Facility's ID: 2009C1

H. Facility's Phone (201) 862-2000

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Flammable Liquid NOS (Toluene, Isopropyl Alcohol) UN1993 F005	RQ	001	TT	04650	G	F005
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above

a. SK Cont. No. 0051349-3

b.

c.

d.

K. Handling Codes for Wastes Listed Above

a. Fuel Blending

b.

c.

d.

15. Special Handling Instructions and Additional Information

Methylene Chloride 30% Isopropyl Alcohol 30%
111-Trichloroethane 20% Toluene 20%

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
Peter Piranian, Jr.	Peter Piranian Jr.	01 17 90

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Donald McGloan	Donald McGloan	01 17 90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
Scott Elliott (?)	[illegible]	1/17/90 (?)

NJA 0741384

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

1HWR1631 NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION PAGE 1
11/04/91 DIVISION OF HAZARDOUS WASTE MANAGEMENT
0 WASTE MANIFESTS FROM 01/01/87 TO 11/04/91
FROM GENERATOR NJD002052017 TO SPECIFIED TSDF'S

0

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
-CONTRACT INDUSTRIES INC 641 DOWD AVE ELIZABETH , NJ NJD002052017	MARISOL INC 125 FACTORY LANE MIDDLESEX , NJ NJD002454544	NJAA639146	10/06/89	F002	SPT HAL SOLV&STLBTM OF DEGREAS	5266 G
	SAFETY-KLEEN CORP 1200 SYLVAN STREET LINDEN , NJ NJD002182897	NJA0741384	01/17/90	F005	NONHL SOLV & STLBTM	4650 G
		NJA0814385	05/17/90	F005	NONHL SOLV & STLBTM	5105 G
		NJA0905420	06/22/90	F005	NONHL SOLV & STLBTM	1855 G

0 4 WORK FILE RECORDS READ
4 LINE ITEMS RECORDS READ

HWM-004C
1/90

Let's protect our earth

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
2 Babcock Place
West Orange, N.J. 07052
(201) 669-3960

NOTICE OF VIOLATION

ID NO. NJD002052017 DATE OCTOBER 9, 1991

NAME OF FACILITY CONTACT INDUSTRIES, INC.

LOCATION OF FACILITY 641 DOWD AVE. ELIZABETH, N.J. 07201

NAME OF OPERATOR MATTHEW MORRIS - TECHNICAL DIRECTOR

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION N.J.A.C. 7:26-9.3(a)3 = FAILURE TO HAVE A HAZARDOUS WASTE CONTAINER LABELED/MARKED WITH THE WORDS "HAZARDOUS WASTE" AND THE DATE UPON WHICH EACH PERIOD OF ACCUMILATION BEGINS. 9.3(d)4 - FAILURE TO MARK A CONTAINER WITH THE WORDS "HAZARDOUS WASTE". 9.4(d)4i - FAILURE TO HAVE ALL CONTAINERS SECURELY CLOSED, EXCEPT THOSE IN USE. 9.4(d)5 - FAILURE TO INSPECT CONTAINER STORAGE AREA ON A DAILY BASIS. 9.6(d)1 - FAILURE TO HAVE IMMEDIATE ACCESS TO COMMUNICATIONS/ ALARM SYSEMS DURING HANDLING OF HAZARDOUS WASTE. 9.6(e) - FAILURE TO HAVE ADEQUATE AISLE SPACE BETWEEN CONTAINERS FOR UNOBSTRUCTIVE MOVEMENT OF EMERGENCY EQUIPMENT and PERSONNEL.

Remedial action to correct these violations must be initiated immediately and be completed by NOVEMBER 8, 1991. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

NJDEP HAZARDOUS WASTE ADVISEMENT PROGRAM 1(609)292-8341

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection
STEPHAN SZARDENINGS

2/2

HWM-004C
1/90

Let's protect our earth

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
2 Babcock Place
West Orange, N.J. 07052
(201) 669-3960

NOTICE OF VIOLATION

ID NO. NJD002052017 DATE OCTOBER 9, 1991

NAME OF FACILITY CONTACT INDUSTRIES, INC.

LOCATION OF FACILITY 611 DOWD AVE. ELIZABETH, N.J. 07201

NAME OF OPERATOR MATTHEW MORRIS - TECHNICAL DIRECTOR

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION N.J.A.C. 7:26-9.7(a) - FAILURE TO HAVE A WRITTEN CONTINGENCY PLAN. 9.6(f)4 - FAILURE TO NOTIFY LOCAL HOSPITAL(S) WITH PROPERTIES OF HAZARDOUS WASTE HANDLED ON-SITE. 9.6(f)3 - FAILURE TO HAVE AN AGREEMENT WITH AN EMERGENCY RESPONSE CONTRACTOR. 9.4(g)8 et seq. - FAILURE TO PERFORM SEMI-ANNUAL DRILLS. 9.4(g)5 - FAILURE TO ANNUALLY REVIEW INITIAL TRAINING RECIEVED BY FACILITY PERSONNEL. 9.4(g)6i-iii - FAILURE TO HAVE ADEQUATE PERSONNEL DOCUMENTS AND RECORDS.

Remedial action to correct these violations must be initiated immediately and be completed by NOVEMBER 8, 1991. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

NJDEP HAZARDOUS WASTE ADVISEMENT PROGRAM 1(609) 292-8341

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection
STEPHAN SZARDENINGS

Telephone Response on 16 JAN 92. Written Response to George Mayer (ATTN: AAH) will follow. AAH

R. Hitchcock

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

JAN 14 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

Mr. Andrew Catanzaro
Plant Manager
Contact Industries, Inc.
641 Dowd Ave.
Elizabeth, New Jersey 07201

Re: Contact Industries, Inc.
EPA I.D. No. NJD002052017

Dear Mr. Catanzaro:

This Notice of Violation is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ("RCRA") of 1976 and the Hazardous and Solid Waste Amendments ("HSWA") of 1984 42 U.S.C. §§ 6901, 6928.

Pursuant to HSWA, EPA promulgated regulations on November 7, 1986, which prohibited the land disposal of restricted waste. 51 Fed. Reg. 40,572 (November 7, 1986). These regulations are published in 40 C.F.R. Part 268, and amend various sections of 40 C.F.R. Parts 260-265 and 270. They became effective on November 8, 1986.

The State of New Jersey is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal restrictions ("LDR").

On or about October 9, 1991, a duly authorized representative of EPA conducted an inspection of the Contact Industries, Inc. facility in Elizabeth, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. During this inspection, the inspector noted that 40 C.F.R. § 268.7(a)(1) which is one of the provisions of the LDR, has been violated. Section 268.7(a)(1) requires the following:

Before a generator offers waste subject to the LDR to a treatment facility, the generator must notify the treatment facility in writing of the appropriate treatment standards set forth in Subpart D of 40 C.F.R. Part 268.

The notice must include the following information:

(i) EPA Hazardous Waste Number;
(ii) The corresponding treatment standards for wastes F001-F005, F039 and wastes prohibited pursuant to § 268.32 or RCRA Section 3004(d). Treatment standards for all other restricted wastes may be referenced by including on the notification the subcategory of the waste, the treatability group(s) of the waste(s), and the C.F.R. section(s) and paragraph(s) where the treatment standards appear. Where applicable treatment standards are expressed as specified technologies in § 268.42, the applicable five letter treatment code found in Table 1 of § 268.42 (e.g. INCIN, WETOX) also must be listed on the notification.
(iii) The manifest number associated with the shipment of waste; and
(iv) Waste analysis data, where available.

At the time of the above referenced inspection, manifest copy NJA0741384 was found to be missing the required LDR notification form. Be advised that EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 C.F.R. Part 268. You must submit, within thirty (30) days of the receipt of this correspondence, documentation, and a description of the actions you have taken to correct the violations noted above and to implement the regulations published in 40 C.F.R. Part 268.

Failure to comply and submit the documentation requested in this Notice of Violation subjects you and/or your company to the enforcement provisions of section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this matter, please contact Mr. Robert Hitchcock, at (212) 264-9590.

Sincerely yours,

for

George C. Meyer, P.E., Chief
Hazardous Waste Compliance Branch

cc: James K. Hamilton, Assistant Director
Office of Enforcement Policy
New Jersey Department of Environmental
Protection and Energy

contact
INDUSTRIES
DIV. OF
SAFEGUARD CHEMICAL CORP.

641 Dowd Avenue, Elizabeth, New Jersey 07201 (201) 351-5900 • (800) 526-6832

January 24, 1992

US - EPA - Region II
Jacob K. Javits Federal Building
New York, NY 10278

Attention: Mr. George C. Meyer, PE, Chief
Hazardous Waste Compliance Branch

Dear Mr. Meyer:

Referring to your letter of January 14, 1992, enclosed please find a copy of the L.D.R. Notification Form for Manifest #NJA0741384.

I have put a copy with my paperwork regarding that shipment. I believe this will put me in compliance.

Please call if any problems.

Very truly yours,

CONTACT INDUSTRIES

Andrew Catanzaro
Plant Manager

AC/pg

cc: Robert Hitchcock - EPA

U.S.E.P.A.
92 JAN 28 AM 11:49
HAZ. WASTE COMP. BR.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP
1200 SYLVAN ST
LINDEN NJ 07036

EPA ID No.: NJD002182897

NJA 074/384

Under manifest number JA90 line number 11a (enter 11a, 11b, 11c, or 11d) the generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste type and the appropriate treatment standards are as follows:

EPA Waste Type: F005

RESTRICTED CONSTITUENTS	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Waste	Check All That Apply
Acetone	0.05	0.59	X
n-Butyl alcohol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-dichlorobenzene	0.68	0.125	
Ethyl acetate	0.05	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	5.0	5.0	
Methanol	0.25	0.75	
Methylene chloride	0.20	0.96	X
Methylene chloride(from pharmaceutical industry)	12.7	0.96	
Methyl ethyl ketone	0.05	0.75	
Methyl isobutyl ketone	0.05	0.33	
Nitrobenzene	0.66	0.125	
Pyridine	1.12	0.33	
Tetrachloroethylene	0.079	0.05	X
Toluene	1.12	0.33	X
1,1,1-Trichloroethane	1.05	0.41	X
1,1,2-Trichloro - 1,2,2 trifluroethane	1.05	0.96	
Trichloroethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	X
Halogenated Organic Compounds	1000.0	1000.0	X
Free Cyanides	1000.0	1000.0	
Arsenic (As)	500.0	500.0	
Cadmium (Cd)	100.0	100.0	
Chromium (Cr VI)	500.0	500.0	
Lead (Pb)	500.0	500.0	
Mercury (Hg)	20.0	20.0	
Nickel (Ni)	134.0	134.0	
Selenium (Se)	100.0	100.0	
Thallium (Tl)	130.0	130.0	

Generator Name: CONTACT INDUSTRIES EPA ID: NJD002052017

Generator Representative Signature: Peter Piranian Jr.

Name & Title of Representative: Peter Piranian, Jr., General Manager
(print or type)

S-K Sample Number: 045033 CONTROL # 0051349

contact
INDUSTRIES
DIV. OF
SAFEGUARD CHEMICAL CORP.

641 Dowd Avenue, Elizabeth, New Jersey 07201 (201) 351-5900 • (800) 526-6832

JAN 2 8 REC'D

January 24, 1992

US - EPA - Region II
Jacob K. Javits Federal Building
New York, NY 10278

Attention: Mr. George C. Meyer, PE, Chief
Hazardous Waste Compliance Branch

Dear Mr. Meyer:

Referring to your letter of January 14, 1992, enclosed please find a copy of the L.D.R. Notification Form for Manifest #NJA0741384.

I have put a copy with my paperwork regarding that shipment. I believe this will put me in compliance.

Please call if any problems.

Very truly yours,

CONTACT INDUSTRIES

Andrew Catanzaro

Andrew Catanzaro
Plant Manager

AC/pg

cc: Robert Hitchcock - EPA